ENGINEERING STATEMENT
IN SUPPORT OF THIRD AMENDMENT TO JOINT PETITION
FOR RULE MAKING
KIMO-DT, ANCHORAGE, ALASKA
CHANNEL 12 41 KW MAX. 240 METERS
APRIL 2004

This engineering statement has been prepared on behalf of Smith Television License Holdings, Inc., licensee of station KIMO(TV), and permittee of KIMO-DT, Anchorage, Alaska in support of a Third Amendment to Joint Petition for Rule Making filed on February 20, 2003 and previously amended on July 24, 2003 and March 12, 2004, ("JPRM") to substitute Channel 12 for the allotted Channel 30 for its digital television (DTV) operation on KIMO-DT.

At present KIMO(TV) operates on analog Channel 13 (210-216 MHz) with 316 kW effective radiated power (ERP) and 238 meters antenna height above average terrain (HAAT) using a non-directional TV antenna from the Frank A. Mengel tower site ("F.A.M. Tower Site"). The geographic coordinates of that site are as follows: N 61° 25' 22", W 149° 52' 20". The F.A.M Tower Site is located approximately 22.7 km (14 miles) north of Anchorage.

The Commission has allotted KIMO(TV) Channel 30 for its digital television (DTV) operation with 1000 kW ERP and 238 meters HAAT. KIMO-DT currently holds a construction permit to operate on DTV Channel 30 with 108 kW ERP and 155 meters HAAT using a directional TV antenna from the F.A.M. Tower site.

In the JPRM, the licensees/permittees of stations KIMO(TV)/KIMO-DT, KTUU-TV/KTUU-DT and KAKM(TV)/KAKM-DT proposed the following amendment to Section 73.622(b) (Digital Television Table of Allotments) of the Commission's rules.

| Community | Current Allotment | Proposed Allotment | |
|---------------|----------------------|---------------------|--|
| Anchorage, AK | 18, 20, 22, *24, *26 | *8, 10, 12, 20, 22, | |
| | 28, 30, 32 | *26, 30, 32 | |

The JPRM specified that the substitute DTV channels would be used by the respective DTV stations at the F.A.M. Tower Site. The Third Amendment to the JPRM

("Third Amendment") proposes further changes to the maximum power levels and/or directional antenna system for each DTV allotment. Specifically, the Third Amendment, as it applies to KIMO-DT specifies a slightly different power level for the station. The amended Channel 12 DTV allotment for station KIMO-DT is for 41 kW maximum ERP and 240 meters HAAT (271 meters antenna radiation center above mean sea level) from the F.A.M. Tower Site which is the licensed site for KIMO(TV). The geographic coordinates of the KIMO(TV) site, and thus for the collocated KIMO-DT site, are set forth above.

The attached Table I provides the relative field values for the directional horizontal pattern of the directional antenna associated with the KIMO-DT Channel 12 DTV allotment.

Analog TV and DTV Allocation Situation

The attached Table II shows the analog TV and DTV stations within 500 km of KIMO-DT site on co-channel 12 and adjacent channels 11 and 13. There are no TV or DTV stations or allotments on Channel 12 within 500 km of KIMO-DT site. Station KTVA-TV, Channel 11, Anchorage, Alaska, site is located 25.7 km south of the KIMO-DT site.

OET Bulletin 69 Study

Since the licensed KTVA, Channel 11 antenna site is located more than 11 km and less than 125 km from the KIMO-DT site, an electromagnetic interference study was conducted according to the FCC OET Bulletin 69 to determine any impact on KTVA's analog TV operation.

The FCC OET Bulletin 69 study was conducted for cell sizes 0.5 km/side and

1 km terrain intervals. In addition, the KIMO-DT ERP in each direction was adjusted according to the horizontal directional pattern of the DTV antenna. The vertical pattern of the proposed DTV antenna was not used in the study.

The results of the OET Bulletin 69 study are provided in the attached Table III, and indicate the proposed Channel 12 DTV operation of KIMO-DT would not cause harmful interference to more than 2% population of the Grade B contour of KTVA-TV. Therefore, the proposed Channel 12 DTV operation at Anchorage, Alaska would be in compliance of Section 73.623(c) of the Commission's rules.

Principal Community Coverage

The attached map shows the computed 36 dBu contour for the proposed KIMO-DT operation on Channel 12 with 41 kW maximum ERP and 240 meters HAAT using a directional antenna. The map indicates the proposed 36 dBu contour would cover all of Anchorage, Alaska.

It has been demonstrated above that the proposed substitution of Channel 12 for Channel 30 would be in full compliance with the Commission's rules. Therefore, Smith Television License Holdings, Inc., respectfully requests the Commission to allot Channel 12 for KIMO(TV) for its DTV operation (KIMO-DT) at Anchorage, Alaska.

Under penalty of perjury the undersigned states that the foregoing statement has been prepared by him and that the facts stated herein are true of his own knowledge, except such facts as are stated to be on information and belief, and as to such facts, he believes them to be true.

5 April 2004

S. K. Khanna Professional Engineer

District of Columbia, PE License No.8057

TABLE I KIMO-DT, CHANNEL 12, ANCHORAGE, ALASKA HORIZONTAL DIRECTIONAL RADIATION PATTERN APRIL 2004

| AZIMUTH | RELATIVE FIELD | ERP/kW |
|---------|----------------|--------|
| 0.0 | 0.710 | 20.67 |
| 10.0 | 0.800 | 26.24 |
| 20.0 | 0.870 | 31.03 |
| 30.0 | 0.950 | 37.00 |
| 40.0 | 0.960 | 37.79 |
| 50.0 | 0.900 | 33.21 |
| 60.0 | 0.820 | 27.57 |
| 70.0 | 0.740 | 22.45 |
| 80.0 | 0.680 | 18.96 |
| 90.0 | 0.640 | 16.79 |
| 100.0 | 0.730 | 21.85 |
| 110.0 | 0.830 | 28.25 |
| 120.0 | 0.940 | 36.23 |
| 130.0 | 0.970 | 38.58 |
| 140.0 | 0.940 | 36.23 |
| 150.0 | 0.840 | 28.93 |
| 160.0 | 0.750 | 23.06 |
| 170.0 | 0.690 | 19.52 |
| 180.0 | 0.680 | 18.96 |
| 190.0 | 0.750 | 23.06 |
| 200.0 | 0.830 | 28.24 |
| 210.0 | 0.910 | 33.95 |
| 220.0 | 0.930 | 35.46 |
| 230.0 | 0.890 | 32.48 |
| 240.0 | 0.810 | 26.90 |
| 250.0 | 0.740 | 22.45 |
| 260.0 | 0.690 | 19.52 |
| 270.0 | 0.700 | 20.09 |
| 280.0 | 0.780 | 24.94 |
| 290.0 | 0.870 | 31.03 |
| 300.0 | 0.940 | 36.92 |
| 310.0 | 0.940 | 36.23 |
| 320.0 | 0.860 | 30.32 |
| 330.0 | 0.800 | 26.24 |
| 340.0 | 0.710 | 20.67 |
| 350.0 | 0.660 | 17.86 |
| 37.0 | 1.000 | 41.00 |
| 129.0 | 1.000 | 41.00 |
| | | |

TABLE II ANALOG TV AND DTV ALLOCATION SITUATION FOR THE PROPSOED DTV OPERATION OF KIMO-DT, ANCHORAGE, ALASKA CHANNEL 12 41 KW 240 METERS APRIL 2004

| CHANNEL | <u>CALL</u> <u>CITY/</u> <u>STATE</u> | <u>GEOGRAPHIC</u> <u>COORDINATES</u> | DISTANCE km |
|---------|--|---|----------------|
| 12 | KIMO-DT Anchorage, AK | N 61-25-22 W 149-52-20 | |
| 11 | KTVA(TV) Anchorage, AK LIC | N 61-11-33 W 149-54-01 | 25.7 |
| 12 | None within 500 km | | |
| 13 | KIMO(TV) Anchorage, AK LIC | N 61-25-22 W 149-52-20 | 0.0 |

TABLE III

TV INTERFERENCE and SPACING ANALYSIS PROGRAM

Date: 04-01-2004 Time: 18:17:29

Record Selected for Analysis

NEW USERRECORD-01 ANCHORAGE

AK US

Channel 12 ERP 41. kW HAAT 240. m RCAMSL 00271 m

Latitude 061-25-22 Longitude 0149-52-20

Status APP Zone 2 Border

Dir Antenna Make usr Model KTUUH Beam tilt N Ref Azimuth

٥.

Last update Cutoff date Docket

Comments Applicant

Cell Size for Service Analysis 0.5 km/side

Distance Increments for Longley-Rice Analysis 1.00 km

Facility meets maximum height/power limits

| Azimuth | ERP | HAAT | 36.0 dBu F(50,90) |
|---------|--------|-------|-------------------|
| (Deg) | (kW) | (m) | (km) |
| 0.0 | 20.668 | 227.7 | 94.1 |
| 45.0 | 35.461 | 202.5 | 95.9 |
| 90.0 | 16.794 | 270.3 | 95.1 |
| 135.0 | 37.393 | 260.2 | 101.0 |
| 180.0 | 18.958 | 270.9 | 96.1 |
| 225.0 | 33.952 | 239.2 | 98.9 |
| 270.0 | 20.090 | 235.4 | 94.5 |
| 315.0 | 33.210 | 217.2 | 96.8 |

Evaluation toward Class A Stations

No Spacing violations or contour overlap to Class A stations

Class A Evaluation Complete

SPACING VIOLATION FOUND BETWEEN STATION

NEW 12 ANCHORAGE AK USERRECORD01

and station

SHORT TO: KTVA 11 ANCHORAGE AK BLCT 19831019KM

061-11-33 0149-54- 1

Req. separation => 11.0 <= 125.0 Actual separation 25.7 Short 99.3(14.7) km

Proposed facility OK to FCC Monitoring Stations

Proposed facility OK toward West Virginia guite zone

Proposed facility OK toward Table Mountian

Proposed facility is beyond the Canadian coordination distance

Proposed facility is beyond the Mexican coordination distance

Proposed station is OK toward AM broadcast stations

Start of Interference Analysis

ARN

Proposed Station

Channel Call City/State

12 NEW ANCHORAGE

AK USERRECORD01

Stations Potentially Affected by Proposed Station

| Chan | Call | City/Sta | ate | Dist(km) | Status | Application | on Ref. |
|-------|--------|-----------|-----|----------|--------|-------------|---------|
| No. | | | | | | | |
| 11 | KTVA | ANCHORAGE | AK | 0.0 | CP | BPCT | - |
| 20010 | 426AAO | | | | | | |
| 11 | KTVA | ANCHORAGE | AK | 25.6 | LIC | BLCT | - |
| 19831 | 019KM | | | | | | |
| 13 | KIMO | ANCHORAGE | AK | 0.0 | LIC | BLCT | - |
| 19960 | 320KE | | | | | | |

Analysis of Interference to Affected Station 1

NTSC Baseline Analysis

Channel Call City/State Application Ref. No.
11 KTVA ANCHORAGE AK DTVPLN -NPLN0694

Stations Potentially Affecting This Station

Chan Call City/State Dist(km) Status Application Ref. No. Results for: 11N AK ANCHORAGE DTVPLN NPLN0694 PLN POPULATION AREA (sq km) within Noise Limited Contour 250632 10652.7 not affected by terrain losses 249923 9759.9 lost to NTSC IX 0.0 0 lost to additional IX by ATV 0 0.0 lost to all IX 0 0.0 Analysis of current record Channel Call City/State Application Ref. No. 11 KTVA ANCHORAGE AK BPCT -20010426AA0 Stations Potentially Affecting This Station Dist(km) Status Application Ref. Chan Call City/State No. 11 KTVF FAIRBANKS AK 395.3 LIC BLCT 19881031KG 12 NEW ANCHORAGE 0.0 APP USERRECORD-01 AK Proposal causes no interference ***************** Analysis of Interference to Affected Station 2 Analysis of current record Channel Call City/State Application Ref. No. 11 KTVA ANCHORAGE AK BLCT -19831019KM Stations Potentially Affecting This Station Chan Call City/State Dist(km) Status Application Ref. No. 12 NEW **ANCHORAGE** 25.6 APP USERRECORD-01 Total scenarios = 2 Result key: 1 Affected station Scenario Before Analysis Results for: 11N AK ANCHORAGE BLCT 19831019KM LIC POPULATION AREA (sq km) within Noise Limited Contour 250632 10652.7 9759.9 not affected by terrain losses 249923 lost to NTSC IX 0 0.0

0

0.0

lost to additional IX by ATV

| lost to all IX | 0 | 0.0 | |
|--|--------------------------------|---|--------|
| Potential Interfering Stations I | ncluded in | above Scenario | 1 |
| After Analysis | | | |
| Arter Maryors | | | |
| Results for: 11N AK ANCHORAGE | BL | CT 19831019Ki | M LIC |
| | POPULATION | N AREA (sq km) | |
| within Noise Limited Contour | 250632 | | |
| not affected by terrain losses | | | |
| lost to NTSC IX | 0 | • • • | |
| lost to additional IX by ATV lost to all IX | 4819 | · - | |
| 105t to all ix | 4819 | 864.1 | |
| Potential Interfering Stations In | ncluded in | above Scenario | 1 |
| 12A AK ANCHORAGE | | | |
| USERRECORD01 APP | | | |
| Result key: 2 | | | |
| Result key: 2 Scenario 2 Affected static | on · | 2 | |
| Before Analysis | 011 | 2 | |
| 501010 18.017-10 | | | |
| Results for: 11N AK ANCHORAGE | BLO | T 19831019K | M LIC |
| | POPULATION | | |
| within Noise Limited Contour | 250632 | | |
| not affected by terrain losses | 249923 | 9759.9 | |
| lost to NTSC IX | 0 | 0.0 | |
| lost to additional IX by ATV | 0 | 0.0 | |
| lost to all IX | 0 | 0.0 | |
| Potential Interfering Stations In | ncluded in | above Scenario | 2 |
| | | | |
| After Analysis | | | |
| Results for: 11N AK ANCHORAGE | BLO | T 19831019K | 4 LIC |
| | POPULATION | AREA (sq km) | |
| within Noise Limited Contour | 250632 | | |
| not affected by terrain losses | 249923 | 9759.9 | |
| lost to NTSC IX | 0 | 0.0 | |
| lost to additional IX by ATV | 4819 | | |
| lost to all IX | 4819 | 864.1 | |
| Potential Interfering Stations In | ncluded in | above Scenario | 2 |
| 12A AK ANCHORAGE | | | |
| USERRECORD01 APP | | | |
| ###################################### | : # # # # # # # # # # # | * # # # # # # # # # # # # # # # # # # # | ****** |

Analysis of Interference to Affected Station 3

NTSC Baseline Analysis Channel Call City/State Application Ref. No. KIMO 13 ANCHORAGE AK DTVPLN -NPLN0809 Stations Potentially Affecting This Station Chan Call City/State Dist(km) Status Application Ref. No. 13 NEW FAIRBANKS AK 395.3 PLN DTVPLN NPLN0810 Results for: 13N AK ANCHORAGE DTVPLN NPLN0809 PLN POPULATION AREA (sq km) within Noise Limited Contour 264909 26134.5 not affected by terrain losses 263914 22253.3 lost to NTSC IX 0 0.0 lost to additional IX by ATV 0 0.0 0 0.0 lost to all IX Analysis of current record City/State Channel Call Application Ref. No. KIMO ANCHORAGE AK 13 BLCT -19960320KE Stations Potentially Affecting This Station City/State Chan Call Dist(km) Status Application Ref. No. 13 960917KG FAIRBANKS AK 395.3 APP BPCT 19960917KG 960920LC FAIRBANKS AK 403.7 APP **BPCT** 19960920LC 13 960920YE FAIRBANKS AK 394.8 APP BPCT 19960920YE 970331KQ FAIRBANKS AK 394.8 APP BPCT 19970331KQ 970331LK FAIRBANKS AK 394.5 APP BPET 19970331LK **ANCHORAGE** 12 NEW 0.0 APP USERRECORD-01 Proposal causes no interference *** Analysis of Interference to Affected Station 4 Analysis of current record Channel Call City/State Application Ref. No. ANCHORAGE 12 NEW USERRECORD-01 AK Stations Potentially Affecting This Station

12

Dist(km) Status Application Ref.

Chan

No.

Call

City/State

| 11 | KTVA | ANCHORAGE | AK | 0.0 | CP | BPCT | - |
|--------|--------|-----------|----|-----|-----|------|---|
| 200104 | 426AAO | | | | | | |
| 13 | KIMO | ANCHORAGE | AK | 0.0 | LIC | BLCT | - |
| 199603 | 320KE | | | | | | |

Total scenarios = 1

3

Result key: 3
Scenario 1 Affected station 4

Before Analysis

Results for: 12A AK ANCHORAGE USERRECORD01 APP

HAAT 240.0 m, ATV ERP 41.0 kW

| | POPULATION | AREA (sq km) |
|--------------------------------|------------|--------------|
| within Noise Limited Contour | 265309 | 29521.2 |
| not affected by terrain losses | 264283 | 25636.8 |
| lost to NTSC IX | 0 | 0.0 |
| lost to additional IX by ATV | 0 | 0.0 |
| lost to ATV IX only | 0 | 0.0 |
| lost to all IX | 0 | 0.0 |

Potential Interfering Stations Included in above Scenario 1

FINISHED FINISHED FINISHED FINISHED FINISHED

ENGINEERING STATEMENT
IN SUPPORT OF THIRD AMENDMENT TO JOINT PETITION
FOR RULE MAKING
KAKM-DT, ANCHORAGE, ALASKA
CHANNEL 8 50 KW MAX. 240 METERS
APRIL 2004

This engineering statement has been prepared on behalf of Alaska Public

Telecommunications, Inc., licensee of station KAKM(TV), and permittee of KAKM-DT,

Anchorage, Alaska in support of a Third Amendment to Joint Petition for Rule Making

filed on February 20, 2003 and previously amended on July 24, 2003 and March 12,

2004, ("JPRM") to substitute Channel 8 for the allotted Channel 24 for its digital

television (DTV) operation.

At present KAKM(TV) operates on analog Channel 7 (174-180 MHz) with 288 kW effective radiated power (ERP) and 240 meters antenna height above average terrain (HAAT) using a non-directional TV antenna from the Frank A. Mengel tower site ("F.A.M. Tower Site"). The geographic coordinates of that site are as follows: N 61° 25' 22", W 149° 52' 20". The F.A.M Tower Site is located approximately 22.7 km (14 miles) north of Anchorage.

The Commission has allotted KAKM(TV) Channel 24 for its digital television (DTV) operation with 1000 kW ERP and 240 meters HAAT. KAKM-DT currently holds a construction permit to operate on DTV Channel 24 with 50 kW ERP and 109 meters HAAT using a non-directional TV antenna from an antenna site which is located in downtown Anchorage, Alaska.

In the JPRM, the licensees/permittees of stations KAKM(TV)/KAKM-DT, KTUU-TV/KTUU-DT and KIMO(TV)/KIMO-DT proposed the following amendment to Section 73.622(b) (Digital Television Table of Allotments) of the Commission's rules.

| Community | munity <u>Current Allotment</u> | |
|---------------|------------------------------------|------------------------------------|
| Anchorage, AK | 18, 20, 22, *24, *26 28, 30, 32 | *8, 10, 12, 20, 22, *26, 30, 32 |

The JPRM specified that the substitute DTV channels would be used by the respective DTV stations at the F.A.M. Tower Site. The Third Amendment to the JPRM ("Third Amendment") proposes further changes to the maximum power levels and/or directional antenna system for each DTV allotment. Specifically, the Third Amendment, as it applies to KAKM-DT specifies a slightly different power level for the station. The amended Channel 8 DTV allotment for station KAKM-DT is for 50 kW maximum ERP and 240 meters HAAT (271 meters antenna radiation center above mean sea level) from the F.A.M. Tower Site which is the licensed site for KAKM(TV). The geographic coordinates of the KAKM(TV) site, and thus for the collocated KAKM-DT site, are set forth above.

The attached Table I provides the relative field values for the directional horizontal pattern of the directional antenna associated with the KAKM-DT Channel 8 DTV allotment.

Analog TV and DTV Allocation Situation

The attached Table II shows the analog TV and DTV stations within 500 km of KAKM-DT site on co-channel 8 and adjacent channels 7 and 9. There are no TV or DTV stations or allotments on Channel 8 within 500 km of KAKM-DT site. The FCC database shows there are two pending applications for Channel 9 analog TV station at Anchorage, Alaska. These applications have been filed by Alaska Broadcast TV, Inc. ("ABTV") (BPET-19960916KE) and Alaska Public Telecommunications ("APT") (BPET-19961115KE). The proposed ABTV Channel 9 analog TV antenna site is located 40.2 km south of KAKM-DT. The proposed APT Channel 9 analog TV site is co-located with KAKM-DT site. ABTV and APT have filed with the Commission a "Joint Request"

for Approval of Agreement" ("joint Request") which, if granted, will result in the dismissal of APT's Channel 9 analog TV application and the grant of ABTV's Channel 9 analog TV application.

OET Bulletin 69 Study

Since the ABTV Channel 9 antenna site is located more than 11 km and less than 125 km from the KAKM-DT site, an electromagnetic interference study was conducted according to the FCC OET Bulletin 69 to determine any impact on ABTV's analog Channel 9 operation.

The FCC OET Bulletin 69 study was conducted for cell sizes 0.5 km/side and 1 km terrain intervals. In addition, the KAKM-DT ERP in each direction was adjusted according to the horizontal directional pattern of the DTV antenna. The vertical pattern of the proposed DTV antenna was not used in the study.

The results of the OET Bulletin 69 study are provided in the attached Table III, and indicate the proposed Channel 8 DTV operation of KAKM-DT would cause interference to 3.3% population of the Grade B contour of ABTV's proposed Channel 9 operation. However, as shown in Section 2 of the Settlement Agreement which is attached to the Joint Request ABTV has agreed to accept any interference caused by the proposed KAKM-DT operation on Channel 8 with up to 100 kW.

Principal Community Coverage

The attached map shows the computed 36 dBu contour for the proposed KAKM-DT operation on Channel 8 with 50 kW maximum ERP and 240 meters HAAT using a directional antenna. The map indicates the proposed 36 dBu contour would cover all of Anchorage, Alaska.

It has been demonstrated above that the proposed substitution of Channel 8 for Channel 24 would be in compliance with the Commission's rules and policies.

Therefore, Alaska Public Telecommunications, Inc. respectfully requests the Commission to allot Channel 8 for KAKM(TV) for its DTV operation (KAKM-DT) at Anchorage, Alaska.

Under penalty of perjury the undersigned states that the foregoing statement has been prepared by him and that the facts stated herein are true of his own knowledge, except such facts as are stated to be on information and belief, and as to such facts, he believes them to be true.

5 April 2004

S. K. Khanna Professional Engineer District of Columbia, PE License No.8057

TABLE I KAKM-DT, CHANNEL 8, ANCHORAGE, ALASKA HORIZONTAL DIRECTIONAL RADIATION PATTERN APRIL 2004

| <u>AZIMUTH</u> | RELATIVE FIELD | ERP/kW |
|----------------|----------------|--------|
| 0.0 | 0.710 | 25.21 |
| 10.0 | 0.800 | 32.00 |
| 20.0 | 0.870 | 37.85 |
| 30.0 | 0.950 | 45.13 |
| 40.0 | 0.960 | 46.08 |
| 50.0 | 0.900 | 40.50 |
| 60.0 | 0.820 | 33.62 |
| 70.0 | 0.740 | 27.38 |
| 80.0 | 0.680 | 23.12 |
| 90.0 | 0.640 | 20.48 |
| 100.0 | 0.730 | 26.65 |
| 110.0 | 0.830 | 34.45 |
| 120.0 | 0.940 | 44.18 |
| 130.0 | 0.970 | 47.05 |
| 140.0 | 0.940 | 44.18 |
| 150.0 | 0.840 | 35.28 |
| 160.0 | 0.750 | 28.13 |
| 170.0 | 0.690 | 23.81 |
| 180.0 | 0.680 | 23.12 |
| 190.0 | 0.750 | 28.13 |
| 200.0 | 0.830 | 34.45 |
| 210.0 | 0.910 | 41.41 |
| 220.0 | 0.930 | 43.25 |
| 230.0 | 0.890 | 39.61 |
| 240.0 | 0.810 | 32.81 |
| 250.0 | 0.740 | 27.38 |
| 260.0 | 0.690 | 23.81 |
| 270.0 | 0.700 | 24.50 |
| 280.0 | 0.780 | 30.42 |
| 290.0 | 0.870 | 37.85 |
| 300.0 | 0.940 | 45.03 |
| 310.0 | 0.940 | 44.18 |
| 320.0 | 0.860 | 36.98 |
| 330.0 | 0.800 | 32.00 |
| 340.0 | 0.710 | 25.21 |
| 350.0 | 0.660 | 21.78 |
| 37.0 | 1.000 | 50.00 |
| 129.0 | 1.000 | 50.00 |

TABLE II ANALOG TV AND DTV ALLOCATION SITUATION FOR THE PROPSOED DTV OPERATION OF KAKM-DT, ANCHORAGE, ALASKA CHANNEL 8 50 KW 240 METERS APRIL 2004

| CHANNEL | CALL | <u>CITY/</u> <u>STATE</u> | GEOGRAPHIC COORDINATES | DISTANCE km |
|---------|---------------------------|------------------------------|---------------------------|----------------|
| 8 | KAKM-DT | Anchorage, AK | N 61-25-22 W 149-52-20 | |
| 7 | KAKM(TV) | Anchorage, AK | N 61-25-22 W 149-52-20 | 0.0 |
| 7 | KFXF(TV) | Fairbanks, AK | N 64-55-20 W 147-42-55 | 404.9 |
| 8 | None within | 500 km | | •• |
| 9 | Application BPET-19960 | Anchorage, AK 916KE | N 61-04-02 W 149-44-36 | 40.2 |
| 9 | Application BPET-19961 | Anchorage, AK 115KE | N 61-25-22 W 149-52-20 | 0.0 |

TABLE III

TV INTERFERENCE and SPACING ANALYSIS PROGRAM

Date: 04-05-2004 Time: 09:19:06

Record Selected for Analysis

NEW USERRECORD-01 ANCHORAGE

AK US

Channel 08 ERP 50. kW HAAT 240. m RCAMSL 00271 m

Latitude 061-25-22 Longitude 0149-52-20

Status APP Zone 2 Border

Dir Antenna Make usr Model KTUUH Beam tilt N Ref Azimuth

0.

Last update Cutoff date Docket

Comments Applicant

Cell Size for Service Analysis 0.5 km/side

Distance Increments for Longley-Rice Analysis 1.00 km

Facility meets maximum height/power limits

| Azimuth | ERP | HAAT | 36.0 dBu F(50,90) |
|---------|--------|-------|-------------------|
| (Deg) | (kW) | (m) | (km) |
| 0.0 | 25.205 | 227.7 | 95.7 |
| 45.0 | 43.245 | 202.5 | 97.4 |
| 90.0 | 20.480 | 270.3 | 96.7 |
| 135.0 | 45.601 | 260.2 | 102.6 |
| 180.0 | 23.120 | 270.9 | 97.6 |
| 225.0 | 41.405 | 239.2 | 100.5 |
| 270.0 | 24.500 | 235.4 | 96.1 |
| 315.0 | 40.500 | 217.2 | 98.4 |

Evaluation toward Class A Stations

No Spacing violations or contour overlap to Class A stations

Class A Evaluation Complete

SPACING VIOLATION FOUND BETWEEN STATION

NEW 08 ANCHORAGE

AK USERRECORD01

and station

SHORT TO: 960916KE 09 ANCHORAGE AK BPET 19960916KE 061-04- 2 0149-44-36

Reg. separation => 11 0 <= 125 0 Actual separation 40 2 Short 84 8

Req. separation => 11.0 <= 125.0 Actual separation 40.2 Short 84.8(29.2) km

Proposed facility OK to FCC Monitoring Stations

Proposed facility OK toward West Virginia quite zone

Proposed facility OK toward Table Mountian

Proposed facility is beyond the Canadian coordination distance

Proposed facility is beyond the Mexican coordination distance

Proposed station is OK toward AM broadcast stations

Start of Interference Analysis

Proposed Station

Channel Call City/State
08 NEW ANCHORAGE

ARN

AK USERRECORD01

Stations Potentially Affected by Proposed Station

| £. |
|----|
| |
| |
| |
| |
| |
| |
| |
| |

Analysis of Interference to Affected Station 1

NTSC Baseline Analysis

Channel Call City/State App
07 KAKM ANCHORAGE AK

Application Ref. No. DTVPLN -NPLN0454

Stations Potentially Affecting This Station

| | | | , | , | | | |
|---|--------|---------------------------|---|--------------------|-------------------|------------------|----------------|
| Chan No. | Cal. | l Cit | y/State | Dist(km | n) Status | Applica | tion Ref. |
| | | FAIRB | ANKS AK | 392. | 2 PLN | DTVPLN | - |
| | | r: 7N AK | | POPULATION | AREA (s | | PLN |
| no | t affe | ected by t | ted Contour errain losses | 263914 | 22460 | .3 | |
| lost to NTSC IX lost to additional IX by ATV | | | | | 0.0 | | |
| | | all IX | | 0 | C | 0.0 | |
| | el | current : Call KAKM | | | Applicati BLET | | No. 80917KE |
| | | | ially Affecti | | ion | | |
| Chan | Call | City | y/State | Dist(km | a) Status | Applica | tion Ref. |
| _ | | FAIRB! | ANKS AK | 403. | 7 LIC | BLCT | - |
| 200103 08 | NEW | ANCHO | | | | | |
| | | | JSERRECORD-01 Interference | | | | |
| ##### | ##### | *** | : #################################### | **** | * | ****** | ***** |
| # | | | | | | | |
| Analysis of Interference to Affected Station 2 | | | | | | | |
| | | ne Analysi | | | | | |
| Channe 09 | | NEW | City/S ANCHORAGE A | tate .K | DTVPL | | NO. LN0576 |
| S | tatio | ns Potenti | ally Affecti | ng This Stat | ion | | |
| Chan No. | Call | City | /State | Dist(km | n) Status | Applica | ation Ref. |
| Result | s for | : 9N AK A | NCHORAGE | DTVE POPULATION | LN NP | LN0576 sarkm) | PLN |
| wit | hin N | oise Limit | ed Contour | 289136 | 2825 | _ | |
| | | | rrain losses | 269649 | | | |
| | | NTSC IX | TV by NEW | 0 | | 0.0 | |
| | | all IX | IX by ATV | 0 0 | | 0.0 0.0 | |
| Analys | is of | current r | ecord | | | | |
| Channe | 1 | Call | City/S | | Applicat: | | |
| 09 | ! | 961115KE | ANCHORAGE A | K | BPET | -19 | 961115KE |

Stations Potentially Affecting This Station

| Chan No. | Call | City/State | Dist(km) | Status | Applicati | on Ref. |
|-------------|-----------|--------------------|----------|--------|-----------|---------|
| | | | | | | |
| 09 | KUAC-TV | FAIRBANKS AK | 401.7 | LIC | BLET | -319 |
| 08 | NEW | ANCHORAGE | | | | |
| AK | 0.0 A | APP USERRECORD-01 | | | | |
| Prop | osal caus | es no interference | | | | |
| | | | | | | |

Analysis of Interference to Affected Station 3

Analysis of current record

Channel Call City/State Application Ref. No.
09 960916KE ANCHORAGE AK BPET -19960916KE

Stations Potentially Affecting This Station

Chan Call City/State Dist(km) Status Application Ref.

No. 08 NEW ANCHORAGE

AK 40.1 APP USERRECORD-01

Total scenarios = 1

Result key: 1

Scenario 1 Affected station 3

Before Analysis

| Results for: 9N AK ANCHORAGE | BPET | 19960916KE | APP |
|--------------------------------|------------|--------------|-----|
| | POPULATION | AREA (sq km) | |
| within Noise Limited Contour | 289136 | 28253.6 | |
| not affected by terrain losses | 269649 | 24921.3 | |
| lost to NTSC IX | 0 | 0.0 | |
| lost to additional IX by ATV | 0 | 0.0 | |
| lost to all IX | 0 | 0.0 | |

Potential Interfering Stations Included in above Scenario 1

After Analysis

| Results for: 9N AK ANCHORAGE | BPET | 19960916KE | APP |
|--------------------------------|------------|--------------|-----|
| | POPULATION | AREA (sq km) | |
| within Noise Limited Contour | 289136 | 28253.6 | |
| not affected by terrain losses | 269649 | 24921.3 | |
| lost to NTSC IX | 0 | 0.0 | |
| lost to additional IX by ATV | 9594 | 320.1 | |
| lost to all IX | 9594 | 320.1 | |

Potential Interfering Stations Included in above Scenario 1

8A AK ANCHORAGE

USERRECORD01

APP

The following station failed the de minimis interference criteria.

8D AK ANCHORAGE

USERRECORD01

ERP 50.00 kW HAAT 240.0 m RCAMSL 271.0 m

Antenna usr KTUUH

Due to interference to the following station and scenario:

9N AK ANCHORAGE BPET 19960916KE

ERP 316.00 kW HAAT 212.0 m RCAMSL 538.0 m

Percent new DTV interference without proposal: 0.0 BPET

19960916KE

Percent new DTV interference with proposal: 3.3 BPET

19960916KE

Proposed station is MX

8A AK ANCHORAGE

USERRECORD01 APP

9N AK ANCHORAGE BPET 19960916KE APP

Proposal MX with BPET 19960916KE scenario 1 of station

3

Analysis of Interference to Affected Station 4

Analysis of current record

Channel Call City/State Application Ref. No.

08 NEW ANCHORAGE

AK USERRECORD-01

Stations Potentially Affecting This Station

Dist(km) Status Application Ref. City/State Chan Call No. ANCHORAGE AK 0.0 LIC BLET 07 KAKM 19980917KE 0.0 APP 961115KE ANCHORAGE AK BPET 09 19961115KE 960916KE ANCHORAGE AK 40.1 APP BPET 19960916KE

Total scenarios = 1

Result key:

Scenario 1 Affected station 4

Before Analysis

Results for: 8A AK ANCHORAGE USERRECORD01 APP

HAAT 240.0 m, ATV ERP 50.0 kW

| | POPULATION | AREA (sq km) |
|--------------------------------|------------|--------------|
| within Noise Limited Contour | 265380 | 30474.7 |
| not affected by terrain losses | 264372 | 26784.5 |
| lost to NTSC IX | 0 | 0.0 |
| lost to additional IX by ATV | 0 | 0.0 |
| lost to ATV IX only | 0 | 0.0 |
| lost to all IX | 0 | 0.0 |

Potential Interfering Stations Included in above Scenario 1

FINISHED FINISHED FINISHED FINISHED FINISHED